

**UNITED STATES DISTRICT COURT
DISTRICT OF MAINE**

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|----------------------------------|---|------------------------------------|
| UNITED STATES OF AMERICA, |) | |
| |) | |
| v. |) | Case No.: 1:23-cr-00103-JAW |
| |) | |
| |) | |
| ANGELO CASTIGLIOLA, |) | |
| Defendant |) | |

UNOPPOSED MOTION TO ENLARGE DEADLINES

NOW COMES the Defendant, by and through his Undersigned Counsel, and hereby requests that this Honorable Court enlarge the deadline to object to the Presentence Investigation Report, and in support thereof states as follows:

1. The Defendant has been charged with one (1) count of Making Repeated Telephone Calls with Intent to Harass (Class E Felony) and two (2) counts of Transmitting Threatening Interstate Communication (Class D Felony).
2. Probation filed their Presentence Investigation Report on October 15, 2024.
3. Undersigned has not yet had the opportunity to meet with Mr. Castigliola to review the PSR and discuss objections.
4. For these reasons, the Defense is requesting that the deadline to file an objection to the presentence investigation report be enlarged by 14 days to November 12, 2024. The Defense also requests that Probation's deadline to file their final PSR be extended to 14 days after this deadline to November 26, 2024.

5. The Defense has consulted with the Government, and they do not object to this motion.

WHEREFORE, the Defense respectfully requests this Court grant this motion in all respects and order any further relief it deems just and proper.

Respectfully submitted,

Dated: October 29, 2024

/s/ Scott Hess

Scott Hess, Esq., BBO #004508

Attorney for the Defendant

Law Office of Scott F. Hess

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CERTIFICATE OF SERVICE

I hereby certify that on October 29, 2024, I filed the foregoing Unopposed Motion to Enlarge Deadlines using the Court's CM/ECF system, which will cause a copy of the Motion to be sent to all counsel of record.

/s/ Scott Hess

Scott Hess, Esq., BBO #4508

Attorney for the Defendant

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